

ELIZABETH R. STEFFENBERG V. T. GENE GILMAN, ET AL.
 UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF MASSACHUSETTS
 Civil Action No.: 04-40113 NMG

PRIVILEGE LOG FOR REQUEST # 31
 OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
 DEFENDANT, DAVID M. SCOLL
 AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
10/19/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes of conference with T. Gene Gilman concerning TradeTek
10/17/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
10/16/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes of conference with T. Gene Gilman concerning TradeTek
10/10/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with David West (agent of TradeTek) concerning TradeTek
9/19/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning TradeTek
10/6/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Tim Hogan (agent of TradeTek and/or Commonwealth Financial)
10/5/2000	WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
8/16/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Tim Hogan (agent of TradeTek and/or Commonwealth Financial)
Printed on 11/13/2003	AC	Computer Generated Report	Created by Attorney Scoll	Client Billing Worksheet for TradeTek; contains content of communications with T. Gene Gilman
6/7/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on Office Conference with T. Gene Gilman concerning TradeTek
3/30/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning TradeTek
3/24/1999	WP/OP	Attorney Notes	By Attorney Scoll	Notes concerning TradeTek
3/4/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning TradeTek
3/10/1999	WP/OP	Attorney Notes	By Attorney Scoll	Notes concerning TradeTek
3/12/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning TradeTek
3/15/1999	WP/OP	Attorney Notes	By Attorney Scoll	Notes concerning TradeTek
11/10/2003	AC	Email	From David West (agent of TradeTek) to other agents of TradeTek and Attorney Scoll	Re: TradeTek
4/27/1999	AC/WP	Attorney Notes	By Attorney Scoll	Notes on conference with David Gelfond (TradeTek agent) and F. Occhiuti (outside counsel for TradeTek) re: TradeTek

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
3/11/1999	AC	Facsimile	From Roula Karanikola (TradeTek agent) to Attorney Scoll	RE: TradeTek
Undated	WP/OP	Draft Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: TradeTek
8/14/1998	WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
8/20/1998	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with F. Occhiali (outside counsel to TradeTek) re: TradeTek
9/14/1998	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with TradeTek agents, outside counsel to TradeTek and T. Gene Gilman re: TradeTek
12/22/1998	AC/WP/OP	Letter	From outside counsel (of TradeTek) to T. Gene Gilman with cc to Attorney Scoll	RE: TradeTek
Undated	WP/OP	Notes	From Attorney Scoll's office	Re: TradeTek
6/21/1999	WP/OP	Interoffice Research Memo	From legal assistant to Attorney Scoll	Re: TradeTek
Undated	WP/OP	Legal Research Materials and Notes	By Attorney Scoll/assistant to Attorney Scoll	Re: TradeTek
6/16/1999	AC/WP/OP	Facsimile	From Roula Karanikola (agent of TradeTek) to legal assistant to Attorney Scoll	Re: TradeTek
Undated	WP/OP	Draft Legal Document and Attorney Notes	By Attorney Scoll	Re: TradeTek
6/30/1999	AC/WP/OP	Facsimile	From Attorney Scoll to Akek Msumba (TradeTek agent)	Re: TradeTek
Undated	WP/OP	Draft Legal Document	By Attorney Scoll	Re: TradeTek
6/30/1999	AC	Facsimile	From Aleke Msumba (TradeTek agent) to Attorney Scoll	RE: TradeTek
6/1/1999	AC	Letter	From Aleke Msumba (TradeTek agent) to Attorney Scoll	Re: TradeTek
Undated	WP	Legal Document with Notes thereon	Notes by client	RE: TradeTek
6/10/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Rhoula Karanikola (TradeTek agent) re: TradeTek
6/10/1999	WP/OP	Draft Legal Document	By Attorney Scoll	Re: TradeTek
Printed on 6/17/04	AC	Computer Generated Report	Created by Attorney Scoll	Client Billing Worksheet for TradeTek; contains information on conference with T. Gene Gilman
Undated	WP/OP	Draft Court Filing	By Attorney Scoll	Re: TradeTek
7/27/1999	WP/OP	Attorney Notes on Legal Document	Notes by Attorney Scoll	RE: TradeTek
7/18/2003	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes of conference with T. Gene Gilman re: TradeTek
Undated	WP/OP	Legal Research Materials	Compiled by Attorney Scoll	Re: TradeTek
Undated	AC/WP/OP	Letter	From Attorney Scoll to T. Gene Gilman and David Gelfond (TradeTek agent)	Re: TradeTek litigation

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
1/23/2001	AC/WP/OP	Faxsimile	From Attorney Scoll to T. Gene Gilman	Re: TradeTek litigation
10/27/2000	AC	Faxsimile	From Attorney Scoll to T. Gene Gilman	Re: TradeTek litigation
9/21/2000	AC	Email	From David Gelfond to David Gelfond with cc to Attorney Scoll	Re: TradeTek litigation
9/25/2000	AC/WP	Faxed Email	Fax and notation thereon from T. Gene Gilman to Attorney Scoll	Re: TradeTek litigation
9/22/2000	AC/WP	Faxed Email	Fax and notation thereon from T. Gene Gilman to Attorney Scoll	Re: TradeTek litigation
7/19/2001	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	Re: TradeTek
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: TradeTek
2/4/2000	AC	Email	From Aleke Msumba (TradeTek agent) to Attorney Scoll	Re: TradeTek
2/10/2000	AC	Email	From Aleke Msumba (TradeTek agent) to Attorney Scoll	Re: TradeTek
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: TradeTek
Undated	WP/OP	Article with Attorney Notes thereon	Notes by Attorney Scoll	Re: TradeTek
10/11/1999	AC/WP	Email	From Aleke Msumba (TradeTek agent) to other TradeTek agents and Attorney Scoll	RE: TradeTek
9/9/1999	AC/WP/OP	Faxsimile	From Attorney Scoll to T. Gene Gilman	Re: Draft Legal Document for TradeTek
Undated	WP/OP	Draft Legal Document	Created by Attorney Scoll	For TradeTek
12/13/2000	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: TradeTek litigation
11/15/2000	AC	Faxsimile	From Arielle (TradeTek agent) to Attorney Scoll	Re: TradeTek litigation
11/9/2000	AC	Letter	From Attorney Scoll to T. Gene Gilman	RE: TradeTek litigation
10/12/2000	WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek litigation
10/19/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Arielle of TradeTek re: TradeTek litigation
10/3/2000	WP/OP	Draft correspondence with Attorney Notes thereon	Notes by Attorney Scoll	RE: TradeTek
10/4/2000	AC/WP/OP	Email with Attorney Notes thereon	Email from Aleke Msumba to TradeTek agents, T. Gene Gilman, and Attorney Scoll	Re: TradeTek
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: TradeTek
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: TradeTek
10/6/1999	AC	Email	From Aleke Msumba to outside counsel for TradeTek	RE: TradeTek

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Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	RE: TradeTek
3/2/2000	WP/OP	Facsimile	From Attorney Scoll to outside counsel for TradeTek	Re: TradeTek
3/1/2000	AC	Facsimile	From David Gelfond (TradeTek agent) to Attorney Scoll	RE: TradeTek
3/24/2000	AC	Facsimile	From David Gelfond (TradeTek agent) to Attorney Scoll	Re: TradeTek
10/27/2000	WP/OP	Email	Between outside counsel for TradeTek	Re: legal issues pertaining to TradeTek
10/27/2000	AC	Email	From Aleke Msumba to Attorney Scoll	Re: TradeTek
10/26/2000	WP/OP	Legal Research Materials		Re: TradeTek legal issues
2/5/2001	AC/WP/OP	Email	From outside legal counsel for TradeTek to TradeTek agent	RE: TradeTek
2/5/2001	AC	Email	From TradeTek agent to Attorney Scoll	Re: TradeTek
4/2/2001	WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
4/19/2001	WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
4/19/2001	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with TradeTek agents and T. Gene Gilman Re: TradeTek
Undated	WP/OP	Document with Attorney Notes thereon	Notes by Attorney Scoll	Notes on conference with TradeTek draft document
10/13/2000	AC/WP	Attorney Notes	By Attorney Scoll	Re: TradeTek
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: TradeTek
3/14/2001	AC/WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
4/1/1999	AC	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: TradeTek
4/30/2001	WP/OP	Attorney Notes on correspondence to Attorney Scoll/TradeTek	By Attorney Scoll	Re: TradeTek
Notes undated	WP/OP	Notes by Attorney Scoll	Re: TradeTek	Notes on conference with other attorneys for T. Gene Gilman/TradeTek
5/1/2001	AC/WP	Facsimile	From David West (TradeTek agent) to Attorney Scoll	Re: TradeTek
3/10/2003	WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with other attorneys for T. Gene Gilman/TradeTek; contains content of communications with T. Gene Gilman and other TradeTek agents
Printed on 3/10/2004	AC	Computer Generated Report	By Attorney Scoll	For: TradeTek
Undated	WP/OP	Draft Legal Document with Attorney Notations thereon	By Attorney Scoll	For: TradeTek

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PRIVILEGE LOG FOR REQUEST # 32
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DEFENDANT, DAVID M. SCOLL
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10/17/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
10/16/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes of conference with T. Gene Gilman concerning TradeTek
10/10/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with David West (agent of TradeTek) concerning TradeTek
9/19/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning TradeTek
10/6/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Tim Hogan (agent of TradeTek and/or Commonwealth Financial) concerning TradeTek
10/5/2000	WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
8/16/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Tim Hogan (agent of TradeTek and/or Commonwealth Financial) concerning TradeTek
8/8/2002	AC	Invoice	From Attorney Scoll to Commonwealth Financial Holdings	Invoice contains content of communications with T. Gene Gilman
Printed on 11/13/2003	AC	Computer Generated Report	Created by Attorney Scoll	Client Billing Worksheet for TradeTek; contains content of communications with T. Gene Gilman
6/7/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on Office Conference with T. Gene Gilman concerning TradeTek
3/30/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning TradeTek
3/24/1999	WP/OP	Attorney Notes	By Attorney Scoll	Notes concerning TradeTek
3/4/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning TradeTek
3/10/1999	WP/OP	Attorney Notes	By Attorney Scoll	Notes concerning TradeTek
3/12/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning TradeTek
3/15/1999	WP/OP	Attorney Notes	By Attorney Scoll	Notes concerning TradeTek
11/10/2003	AC	Email	From David West (agent of TradeTek) to other agents of TradeTek and Attorney Scoll	Re: TradeTek
9/18/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning TradeTek

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
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3/11/1999	AC	Facsimile	From Roula Karanikola (TradeTek agent) to Attorney Scoll	RE: TradeTek
Undated	WP/OP	Draft Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: TradeTek
8/14/1998	WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
8/20/1998	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with F. Occhiali (outside counsel to TradeTek) re: TradeTek
9/14/1998	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with TradeTek agents, outside counsel to TradeTek and T. Gene Gilman re: TradeTek
12/22/1998	AC/WP/OP	Letter	From outside counsel (of TradeTek) to T. Gene Gilman with cc to Attorney Scoll	RE: TradeTek
Undated	WP/OP	Notes	From Attorney Scoll's office	Re: TradeTek
6/21/1999	WP/OP	Interoffice Research Memo	From legal assistant to Attorney Scoll	Re: TradeTek
Undated	WP/OP	Legal Research Materials and Notes	By Attorney Scoll/assistant to Attorney Scoll	Re: TradeTek
6/16/1999	AC/WP/OP	Facsimile	From Roula _____ (agent of TradeTek to legal assistant to Attorney Scoll)	Re: TradeTek
Undated	WP/OP	Draft Legal Document and Attorney Notes	By Attorney Scoll	Re: TradeTek
6/30/1999	AC/WP/OP	Facsimile	From Attorney Scoll to Atek Msumba (TradeTek agent)	Re: TradeTek
Undated	WP/OP	Draft Legal Document	By Attorney Scoll	Re: TradeTek
6/30/1999	AC	Facsimile	From Aleke Msumba (TradeTek agent) to Attorney Scoll	RE: TradeTek
6/1/1999	AC	Letter	From Aleke Msumba (TradeTek agent) to Attorney Scoll	Re: TradeTek
Undated	WP	Legal Document with Notes thereon	Notes by client	RE: TradeTek
6/10/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Rhouta Karanikola (TradeTek agent) re: TradeTek
6/10/1999	WP/OP	Draft Legal Document	By Attorney Scoll	Re: TradeTek
Printed on 6/17/04	AC	Computer Generated Report	Created by Attorney Scoll	Client Billing Worksheet for TradeTek; contains information on conference with T. Gene Gilman
Undated	WP/OP	Draft Court Filing	By Attorney Scoll	Re: TradeTek
7/27/1999	WP/OP	Attorney Notes on Legal Document	Notes by Attorney Scoll	RE: TradeTek
7/18/2003	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes of conference with T. Gene Gilman re: TradeTek
Undated	WP/OP	Legal Research Materials	Compiled by Attorney Scoll	Re: TradeTek

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
Undated	AC/WP/OP	Letter	From Attorney Scoll to T. Gene Gilman and David Gelfond (TradeTek agent)	Re: TradeTek litigation
1/23/2001	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: TradeTek litigation
10/27/2000	AC	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: TradeTek litigation
9/21/2000	AC	Email	From David Gelfond to David Gelfond with cc to Attorney Scoll	Re: TradeTek litigation
9/25/2000	AC/WP	Faxed Email	Fax and notation thereon from T. Gene Gilman to Attorney Scoll	Re: TradeTek litigation
9/22/2000	AC/WP	Faxed Email	Fax and notation thereon from T. Gene Gilman to Attorney Scoll	Re: TradeTek litigation
7/19/2001	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	Re: TradeTek
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: TradeTek
2/4/2000	AC	Email	From Aleke Msumba (TradeTek agent) to Attorney Scoll	Re: TradeTek
2/10/2000	AC	Email	From Aleke Msumba (TradeTek agent) to Attorney Scoll	Re: TradeTek
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: TradeTek
Undated	WP/OP	Article with Attorney Notes thereon	Notes by Attorney Scoll	RE: TradeTek
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9/9/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Draft Legal Document for TradeTek
Undated	WP/OP	Draft Legal Document	Created by Attorney Scoll	For TradeTek
12/13/2000	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: TradeTek litigation
11/15/2000	AC	Facsimile	From Arielle (TradeTek agent) to Attorney Scoll	Re: TradeTek litigation
11/9/2000	AC	Letter	From Attorney Scoll to T. Gene Gilman	RE: TradeTek litigation
10/12/2000	WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek litigation
10/19/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Arielle of TradeTek re: TradeTek litigation
10/3/2000	WP/OP	Draft correspondence with Attorney Notes thereon	Notes by Attorney Scoll	RE: TradeTek
10/4/2000	AC/WP/OP	Email with Attorney Notes thereon	Email from Aleke Msumba to TradeTek agents, T. Gene Gilman, and Attorney Scoll	Re: TradeTek
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: TradeTek

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: TradeTek
10/6/1999	AC	Email	From Aleke Msumba to outside counsel for TradeTek	RE: TradeTek
10/6/1999	AC	Email	From Aleke Msumba to Attorney Scoll	Re: TradeTek
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	RE: TradeTek
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	RE: TradeTek
3/2/2000	WP/OP	Faxsimile	From Attorney Scoll to outside counsel for TradeTek	Re: TradeTek
3/1/2000	AC	Faxsimile	From David Gelfond ('TradeTek agent) to Attorney Scoll	RE: TradeTek
3/24/2000	AC	Faxsimile	From David Gelfond ('TradeTek agent) to Attorney Scoll	Re: TradeTek
10/27/2000	WP/OP	Email	Between outside counsel for TradeTek and Attorney Scoll	Re: legal issues pertaining to TradeTek
10/27/2000	AC	Email	From Aleke Msumba to Attorney Scoll	Re: TradeTek
10/26/2000	WP/OP	Legal Research Materials		Re: TradeTek legal issues
2/5/2001	AC/WP/OP	Email	From outside legal counsel for TradeTek to TradeTek agent	RE: TradeTek
2/5/2001	AC	Email	From TradeTek agent to Attorney Scoll	Re: TradeTek
4/2/2001	WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
4/19/2001	WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
4/19/2001	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with TradeTek agents and T. Gene Gilman Re: TradeTek
Undated	WP/OP	Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: TradeTek
10/13/2000	AC/WP	Email	From Aleke Msumba to Attorney Scoll	Re: TradeTek draft document
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
3/14/2001	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: TradeTek
4/1/1999	AC	Faxsimile	From Attorney Scoll to T. Gene Gilman	Re: TradeTek
4/30/2001	WP/OP	Attorney Notes	By Attorney Scoll	Re: TradeTek
Notes undated	WP/OP	Attorney Notes on correspondence to Attorney Scoll/TradeTek	Notes by Attorney Scoll	RE: TradeTek
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3/10/2003	WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with other attorneys for T. Gene Gilman/TradeTek re: TradeTek

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
Printed on 3/10/2004	AC	Computer Generated Report	By Attorney Scoll	Client Billing Worksheet for TradeTek; contains content of communications with T. Gene Gilman and other TradeTek agents
Undated	WP/OP	Draft Legal Document with Attorney Notations thereon	By Attorney Scoll	For: TradeTek
8/30/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman and Steve Gilman Re: TradeTek

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PRIVILEGE LOG FOR REQUEST # 33
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 DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
SCOLL DOES NOT POSSESS ANY PRIVILEGED DOCUMENTS RESPONSIVE TO THIS REQUEST.				

ELIZABETH R. STEFFENBERG V. T. GENE GILMAN, ET AL.
 UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF MASSACHUSETTS
 Civil Action No.: 04-40113 NMG

PRIVILEGE LOG FOR REQUEST # 34
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 DEFENDANT, DAVID M. SCOLL

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9/25/2000	AC/WP	Faxed Email	Fax and notation thereon from T. Gene Gilman to Attorney Scoll	Re: TradeTek litigation

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 UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF MASSACHUSETTS
 Civil Action No.: 04-40113 NMG

PRIVILEGE LOG FOR REQUEST # 35
 OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
 DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
10/13/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
10/10/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with David West (agent of TradeTek and/or Commonwealth Financial) re: Commonwealth Financial
9/15/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
10/12/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with David West, T. Gene Gilman, Tim Oullette, Scoll Gilman, Aleck Msumba re: Commonwealth Financial
10/6/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Tim Hogan re: Commonwealth Financial
10/4/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
8/16/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Tim Hogan re: Commonwealth Financial
8/24/2000	WP/OP	Attorney Notes	By Attorney Scoll	Notes on Commonwealth Financial
8/12/2000	WP/OP	Attorney Notes	By Attorney Scoll	Notes on Commonwealth Financial
8/8/2002	AC	Invoice	From Attorney Scoll to Commonwealth Financial	Invoice contains content of conference with T. Gene Gilman
8/16/1999	AC	Invoice	From Attorney Scoll to Commonwealth Financial	Invoice contains content of conference with T. Gene Gilman
7/6/1999	AC	Invoice	From Attorney Scoll to Commonwealth Financial	Invoice contains content of conference with T. Gene Gilman
6/7/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
3/30/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
3/24/1999	WP/OP	Attorney Notes	By Attorney Scoll	Re: Commonwealth Financial
3/4/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
3/10/1999	WP/OP	Attorney Notes	By Attorney Scoll	Re: Commonwealth Financial
3/12/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
8/13/1999	WP/OP	Facsimile	From Attorney Scoll to outside counsel for Commonwealth Financial	RE: Commonwealth Financial

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
7/23/1999	AC/WP/OP	Letter	From Attorney Scoll to T. Gene Gilman	Re: Commonwealth Financial
7/23/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Commonwealth Financial
7/21/1999	WP/OP	Attorney Notes	By Attorney Scoll	Re: Commonwealth Financial
7/20/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Commonwealth Financial
7/16/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Commonwealth Financial
7/22/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Commonwealth Financial
7/22/1999	AC/WP/OP	Facsimile	From Attorney Scoll to outside counsel for Commonwealth Financial	Facsimile contains content of communications from T. Gene Gilman; fax concerns Commonwealth Financial
7/22/1999	AC/WP/OP	Draft Letter	Draft Letter from Scoll to T. Gene Gilman	RE: Commonwealth Financial
7/21/1999	AC/WP/OP	Facsimile	From Attorney Scoll to outside counsel for Commonwealth Financial	Facsimile contains content of communications from T. Gene Gilman; fax concerns Commonwealth Financial
7/1/1999	AC	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
7/1/1999	AC/WP/OP	Letter	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
7/1/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Commonwealth Financial
7/1/1999	WP/OP	Attorney Notes	By Attorney Scoll	RE: Commonwealth Financial
7/20/1999	WP/OP	Facsimile	From Attorney Scoll to outside counsel for Commonwealth Financial	RE: Commonwealth Financial
3/1/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
Undated	WP/OP	Attorney Notes	By Attorney Scoll	RE: Commonwealth Financial
2/25/1999	WP/OP	Attorney Notes	By Attorney Scoll	RE: Commonwealth Financial
2/25/1999	WP/OP	Attorney Notes	By Attorney Scoll	RE: Commonwealth Financial
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	RE: Commonwealth Financial
2/12/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
2/1/1999	AC/WP/OP	Email	From T. Gene Gilman to Attorney Scoll	Re: Commonwealth Financial
2/5/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Commonwealth Financial
2/5/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
Undated	WP/OP	Draft Legal Documents	By Attorney Scoll	Re: Commonwealth Financial
2/4/1999	WP/OP	Attorney Notes	By Attorney Scoll	Re: Commonwealth Financial
Undated	WP/OP	Legal Documents with Attorney	Notes by Attorney Scoll	Re: Commonwealth Financial

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1/27/1999	AC/WP/OP	Notes thereon	By Attorney Scoll	Notes on conference with RE: Commonwealth Financial
2/3/1999	WP/OP	Attorney Notes	By Attorney Scoll	RE: Commonwealth Financial
2/1/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with RE: Commonwealth Financial
2/1/1999	WP/OP	Attorney Notes	By Attorney Scoll	RE: Commonwealth Financial
1/29/1999	WP/OP	Attorney Notes	By Attorney Scoll	RE: Commonwealth Financial
1/26/1999	AC	Faxsimile	From T. Gene Gilman to Attorney Scoll	Re: Commonwealth Financial
Notes undated	WP/OP	Document with Attorney Notes thereon	Notes by Attorney Scoll	RE: Commonwealth Financial
1/13/1999	WP/OP	Attorney Notes	By Attorney Scoll	RE: Commonwealth Financial
6/16/2000	WP/OP	Attorney Notes	By Attorney Scoll	RE: Commonwealth Financial
Undated	WP/OP	Legal Research Materials with Attorney Notes thereon	By Attorney Scoll	RE: Commonwealth Financial
Undated	WP/OP	Legal Research Materials with Attorney Notes thereon	By Attorney Scoll	RE: Commonwealth Financial
12/20/2000	WP/OP	Legal Research Materials with Attorney Notes thereon	By Attorney Scoll	RE: Commonwealth Financial
8/29/??	WP/OP	Attorney Notes	By Attorney Scoll	RE: Commonwealth Financial
8/23/2000	WP/OP	Attorney Notes	By Attorney Scoll	RE: Commonwealth Financial
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	RE: Commonwealth Financial
6/26/2000	WP/OP	Draft Letter with Attorney Notes thereon	Notes by Attorney Scoll	RE: Commonwealth Financial
1/24/2001	WP/OP	Attorney Notes	By Attorney Scoll	RE: Commonwealth Financial
Undated	WP	Computer Generated Report	Created by Commonwealth Financial or Attorney Scoll	RE: Commonwealth Financial
5/26/2000	AC	Email	From Tim Hogan to Attorney Scoll	RE: Commonwealth Financial
5/25/2000	AC/WP/OP	Faxsimile	From Attorney Scoll to Tim Hogan with cc to agents of Commonwealth Financial and T. Gene Gilman	RE: Commonwealth Financial
5/31/2000	AC/WP/OP	Faxsimile	From Attorney Scoll to Tim Hogan	RE: Commonwealth Financial
5/31/2000	AC/WP/OP	Email	From Tim Hogan to Attorney Scoll with cc to T. Gene Gilman	RE: Commonwealth Financial
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	For Commonwealth Financial
6/7/2000	WP/OP	Draft Legal Documents with notations thereon by T. Gene Gilman faxed to Attorney Scoll		RE: Commonwealth Financial

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6/9/2000	AC	Fax	From T. Gene Gilman to Attorney Scoll	Re: Commonwealth Financial
6/7/2000	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	Re: Commonwealth Financial
6/20/2000	WP/OP	Attorney Notes	By Attorney Scoll	Re: Commonwealth Financial
12/15/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman and KPMG re: Commonwealth Financial
4/11/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial

ELIZABETH R. STEFFENBERG V. T. GENE GILMAN, ET AL.
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